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*Attorneys for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

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WESTERN ORGANIZATION OF  
RESOURCE COUNCILS,

*Plaintiff,*

vs.

JENNIFER GRANHOLM, et al.,

*Defendants.*

Case No. 4:20-cv-98-BMM

**PLAINTIFF'S MOTION FOR  
SUMMARY JUDGEMENT**

Pursuant to Federal Rule of Civil Procedure 56(a), Plaintiff Western Organization of Resource Councils (WORC) moves for summary judgment on all claims in its Complaint (Doc. 1). This motion is supported by WORC's accompanying brief.

This Court should enter summary judgment for WORC because there is no genuine dispute as to any material facts and WORC is entitled to relief as a matter of law. Fed. R. Civ. P. 56(a). For relief, this Court should order the Department to disclose materials produced for or by the Corporation or the Council's subcommittees between 2017 and 2020. If the Department does not do so promptly, this Court should enjoin operation of the Council and its reliance on the Corporation or subcommittees until the Department has complied with the Court's order, as well as order any other appropriate relief.

DATED this October 20, 2021.

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